



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

T2-000091

1445 North Orchard • Boise, Idaho 83706-2239 • (208) 373-0550

Dirk Kempthorne, Governor
C. Stephen Allred, Director

July 12, 2002

CERTIFIED MAIL #7000 1530 0005 5348 3161

Mr. Ken Ropski, Plant Manager
LP Wood Polymers Incorporated
420 West Franklin Road
Meridian, Idaho 83642

RE: T2-000037, LP Wood Polymers, Incorporated, Meridian, Idaho
Final Tier II Operating Permit No. #001-00115

Dear Mr. Ropski:

The Idaho Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit Number 001-00115 for LP Wood Polymers, Incorporated in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

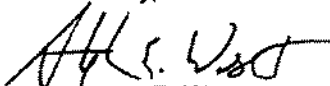
The enclosed Tier II Operating Permit is based on the information contained in your permit application and on the relevant comments received during the public comment period. This Tier II permit is effective immediately. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

Mr. Thomas Krinke of the Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends attendance of your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, DEQ encourages you to contact us to discuss any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Matt Stoll at (208) 373-0550 or mstoll@deq.state.id.us.

Sincerely,


Stephen E. West
Regional Administrator

SEW/REB/cm G:\BALDWIN\OP\TIERII\LPWOODPOLYMERS\FINAL\T2FINALPERMITLTR.DOC

Enclosure

cc: Faye Weber, Air Quality Division
Sherry Davis, Technical Services
Laurie Kral, EPA Region 10
Source File / Reading File
Chris Ramsdell, Air Quality Division

July 12, 2002

MEMORANDUM

TO: Dave Sande, Accountant Supervisor
DEQ Support Services

FROM: Robert E. Baldwin, Air Quality Engineer EIT
DEQ Boise Regional Office

THROUGH: Mike Simon, Facility Operations Coordinator

SUBJECT: Permit Application Fees for Tier II Permit

The following facility has been reviewed for compliance with IDAPA 58.01.01.470 Permit Application Fees for Tier II Permits:

LP Wood Polymers, Incorporated – Meridian, Idaho

LP Wood Polymers, Incorporated in Meridian, Idaho, has applied for a Tier II Operating Permit (#001-00115) for the sources that exist at the facility. DEQ will not release the facility's Tier II Operating Permit until receipt of permit application fees. According to IDAPA 58.01.01.470, the facility is subject to permit application fees for Tier II Permits of:

Five Hundred Dollars and No Cents (\$500.00)

The contact and mailing address for the above facility is:

PERSON CONTACT: Camren Richter
COMPANY ADDRESS: 420 West Franklin Road
Meridian, Idaho 83642

REB:cm G:\Baldwin\opt\tier2\lpwoodpolymers\final\12feememo

cc: DEQ State Office
Boise Regional Office



**Air Pollution
TIER II OPERATING PERMIT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: 001-00115

AQCR: 64

CLASS: (SM) B

SIC: 2431

ZONE: 11

UTM COORDINATE (km): 548.3, 4828.3

1. PERMITTEE

LP Wood Polymers, Inc.

2. PROJECT

Tier II Operating Permit – Northern Ada County PM₁₀ Maintenance Plan

3. MAILING ADDRESS

420 West Franklin

CITY

Meridian

STATE

Idaho

ZIP

83642

4. FACILITY CONTACT

Camren Richter

TITLE

Group Environmental Manager

TELEPHONE

(216) 233-0394

5. RESPONSIBLE OFFICIAL

Ken Ropski

TITLE

Plant Manager

TELEPHONE

(208) 888-6798

6. EXACT PLANT LOCATION

420 West Franklin

COUNTY

Ada

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Extruded Decking Manufacturing

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 58.01.01.400 and pertains only to emissions of air contaminants which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment, which result in any change in the nature or amount of emissions, may be a modification. Modifications are subject to the Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

ADMINISTRATOR, BOISE REGIONAL OFFICE
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 12, 2002

DATE EXPIRES: July 12, 2007

REB MASP.TVMB.4005.480

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001- 00115

Permittee: LP Wood Polymers, Inc.
Location: Meridian, Idaho

Date Issued: July 12, 2002
Date Expires: July 12, 2007

SOURCE: Storage Silo Baghouse, Baghouses Associated with Conversion Project, Receiver Filters, Cartridge Filters, Grinder Baghouse (BH1), and Associated Vehicle Traffic

1. EMISSIONS LIMITS

1.1 EMISSIONS LIMITS

Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM₁₀) emissions from the storage silo baghouse stack, baghouse stacks associated with the conversion project, filter receivers, cartridge filters, and grinder baghouse (BH1), shall not exceed the pounds per hour (lb/hr) and the tons per any consecutive 12-month period (T/yr) limits listed in Appendix.

1.2 OPACITY LIMITS

Emissions from the storage baghouse stack, baghouse stacks associated with the conversion project, filter receivers, cartridge filters, or any other stack, vent, or functionally equivalent opening, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined by the procedure contained in IDAPA 58.01.01.625.

1.3 VISIBLE EMISSIONS LIMITS

Visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by Environmental Protection Agency Reference Method 22 (as described in 40 CFR 60), the Appendix, or a Department-approved alternative method.

2. OPERATING REQUIREMENTS

2.1 OPERATING HOURS

The storage baghouse, baghouses associated with the conversion project, filter receivers, cartridge filters, and BH1 shall be operated according to their respective operation and maintenance (O&M) manual or manufacturer's specifications during operation.

2.2.1 Baghouse Pressure Drop

The pressure drop across the storage silo baghouse, baghouse associated with the conversion project, filter receivers, cartridge filters, and BH1 shall be maintained within the manufacturer's specifications or the O&M manual. Documentation of the operating pressure drop readings for the baghouses, filter receivers, and filter cartridges shall remain onsite at all times and made available to Department representatives upon request.

2.3 Replacement Bags, Filters and Cartridges

All bag, filter, and cartridge replacements must be of the same or equivalent performance quality as stated within the facility's application.

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2.4 Reasonable Control of Fugitive Emissions

As required in IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent PM from becoming airborne. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM.

Some of the reasonable precautions include, but are not limited to, the following:

- 2.4.1 Using water or chemicals for controlling dust when demolishing existing buildings or structures, performing construction operations, grading roads, and clearing of lands;
- 2.4.2 Applying asphalt, water or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces that can create dust;
- 2.4.3 Installing and using hoods, fans and fabric filters, or equivalent systems to enclose and vent the dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- 2.4.4 Covering open-bodied trucks transporting materials likely to give rise to airborne dusts;
- 2.4.5 Paving of roadways and maintaining them in a clean condition; or
- 2.4.6 Promptly removing earth or other stored material from streets.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 Monitor Operation Parameters

The permittee shall monitor and record on a weekly basis, the pressure drop across each baghouse, receiver filter, and cartridge filter. The most recent two years' compilation of records shall be kept onsite, in a record, and shall be made available to Department representatives upon request.

3.2 Operations and Maintenance (O&M) Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for each baghouse, receiver filter, and cartridge filter system that describes the procedures followed to comply with General Provision B and the manufacturer's air pollution control device specifications. This manual shall remain onsite at all times and be made available to Department representatives upon request.

4. REPORTING REQUIREMENTS

4.1 Certification of Documents

All documents submitted to the Department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00115

PERMITTEE: LP WOOD POLYMERS, INC.
LOCATION: MERIDIAN, IDAHO

DATE ISSUED: JULY 12, 2002
DATE EXPIRES: JULY 12, 2007

Appendix

Appendix**LP Wood Polymers, Inc.****Hourly (lb/hr)^b and Annual^c (T/yr)^d Point Source Emissions Limits^a**

SOURCE	PM ₁₀ ^e	
	lb/hr	T/yr
Storage Silo Baghouse Stack	0.014	0.06
Combined emissions of Baghouses, receiver filters, and cartridge filters from Conversion Project with associated vehicle traffic	0.6	2.62
Grinder Baghouse (BH1)	0.09	0.39
Totals	0.704	3.07

^a As determined by a pollutant-specific U.S. EPA reference method, Department-approved alternative, or as determined by the Department emissions estimation methods used in the permit application analysis.

^b Pound per hour

^c As determined by multiplying the actual or allowable (if actual is not available) lb/hr emissions rate by the allowable hours per year that the process(es) may operate, or by actual annual production rates.

^d Tons per year

^e PM₁₀ - particulate matter with an aerodynamic diameter of 10 microns or less.

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PERMITTEE: LP WOOD POLYMERS, INC.
LOCATION: MERIDIAN, IDAHO

DATE ISSUED: JULY 12, 2002
DATE EXPIRES: JULY 12, 2007

GENERAL PROVISIONS

TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
- B. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state approved or accepted Environmental Protection Agency procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e., air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

The permittee shall submit a proposed test date for **each** performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five working days advance notice prior to conducting any re-scheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall

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include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emissions limit unless (1) a more restrictive operating limit is specified elsewhere in this permit, or (2) at such an operating rate, emissions would exceed any emissions limit(s) set forth in this permit.

- J. The provisions of this permit are severable; if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.